

Filed per
Court
1/13/04

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) CRIMINAL NO. 03-10350-RCL
v.)
)
HABEEB ADEOLA AZEEZ)

JOINT SUBMISSION OF THE PARTIES UNDER LOCAL RULE 116.5(A)

Pursuant to Local Rule 116.5(A), the parties state as follows:

(1) Timing Requirements Under L.R. 116.3

The parties do not request relief from the otherwise applicable timing requirements imposed by L.R. 116.3

(2) Expert Discovery under Fed.R.Crim.P. 16(a)(1)(E)

The parties request discovery of each other concerning expert witnesses. The government will provide such discovery twenty eight days prior to trial. Defendant will provide reciprocal discovery fourteen days prior to trial.

(3) Additional Discovery

The parties do not anticipate additional discovery. Nevertheless, any newly discovered evidence shall be disclosed pursuant to the Local Rules.

(4) Motion Date

The defendant requests a period of thirty days to file pretrial dispositive motions.

(5) Periods of Excludable Delay

A period of twenty-eight days should be excluded from the

date the defendant was arraigned (December 3, 2003), pursuant to L.R. 112.2. Additionally, the period from the initial status conference (January 13, 2004) until the final status conference should be excluded, to allow the parties sufficient time to explore disposition of this case short of trial. Exclusion of such time is in the interests of justice.

(6) Whether Trial is Anticipated; Length of Trial

The parties anticipate a trial, which should last less than one week.

(7) Date for Future Status Conferences

The parties defer to the court as to when to set the final status conference.

Respectfully submitted,

MIRIAM CONRAD, Esquire



for defendant HABEEB AZEEZ

MICHAEL J. SULLIVAN
United States Attorney

By:



DICKENS MATHIEU
Assistant U.S. Attorney